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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

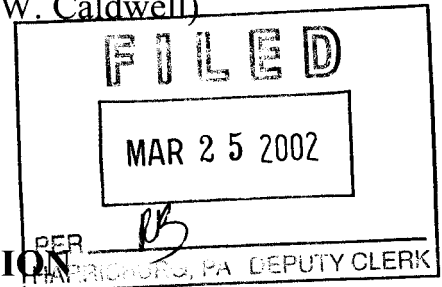
v.

LARRY LIDGETT, et al.,

Defendants.

Civil No. 01-0764

(Judge William W. Caldwell)



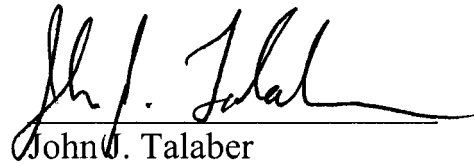
CORRECTIONS DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

The Corrections Defendants, Martin Horn, Robert Meyers, and Larry Lidgett, by and through their attorney, John J. Talaber, Assistant Counsel for the Pennsylvania Department of Corrections, respectfully move this Honorable Court to grant them summary judgment pursuant to Fed.R.Civ.P. 56 as there are no genuine issues of material fact in dispute and they are entitled to judgment as a matter of law. Further, through this Motion, the Corrections Defendants seek dismissal of Plaintiff's Complaint with prejudice based on their qualified immunity to his claims.

WHEREFORE, for the reasons stated within the Correction Defendants' supporting brief to the Motion for Summary Judgment, they respectfully request that Complaint against them be dismissed with prejudice.

Respectfully submitted,
Office of General Counsel

BY:


John W. Talaber

Assistant Counsel
Pa. Department of Corrections
55 Utley Drive
Camp Hill, PA 17011
(717) 731-0444

Dated: March 25, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CLARK,

Plaintiff,

v.

LARRY LIDGETT, et. al.,

Defendants.

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Civil Action No. 01-CV-0764

(Judge William W. Caldwell)

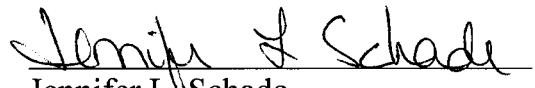
PROOF OF SERVICE

The undersigned hereby certifies that Corrections Defendants' Motion for Summary Judgment was served upon the person(s) in the manner indicated below.

Service by first-class mail
addressed as follows:

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Dated: March 25, 2002